



PUBLIC NOTICE

Federal Communications Commission
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**OFFICE OF ENGINEERING AND TECHNOLOGY SEEKS COMMENT ON
ROBERT BOSCH LLC REQUEST FOR WAIVER OF SECTION 15.245(b) TO PERMIT THE
MARKETING, SALE, AND OPERATION OF AN ACTIVE PARKING LOT MANAGEMENT
SENSOR**

ET Docket No. 20-65

Comment Date: April 3, 2020

Reply Comment Date: April 20, 2020

On September 20, 2019, Robert Bosch LLC (Bosch) filed a request for a waiver of Section 15.245(b) of the Commission's rules for its Parking Lot Occupancy Sensor technology, which it proposes to use as a component of a parking lot management system.¹

Bosch states that it "has developed a low-power Parking Lot Occupancy Sensor (PLS) device for use by integrators and parking lot operators in a system that supports the allocation and indication of available parking spaces for automobiles, and which minimizes traffic within a parking lot or garage."² Bosch argues that use of its system would reduce the time and energy of drivers now wasted looking for available parking spaces, and that the system would incorporate a small PLS sensor in each parking space in a lot. As described by Bosch, the sensors would detect the current occupancy status of each space and communicate that data to a gateway. The gateway would then send data analytics to the Internet Cloud and then, via an application, to drivers' mobile devices or those in their vehicles, directing the driver to the nearest open and available parking spaces as they approach the parking lot.³ Bosch further argues that its proposed PLS sensor necessitates an occupied bandwidth of 80 megahertz in the band 2400-2483.5 MHz, and asserts that its operation should have no adverse effect on licensed or unlicensed terrestrial telecommunications systems and facilities.⁴

Section 15.245 provides for the use of the 2435-2465 MHz band for intentional radiators used as field disturbance sensors.⁵ Because Bosch seeks to operate across a larger amount of spectrum (an occupied bandwidth of 80 megahertz in the 2400-2483.5 MHz range), it seeks a waiver of this rule.⁶

¹ Robert Bosch LLC Request for Waiver of Section 15.245 of the Commission's Rules to Permit the Marketing, Sale and Operation of an Active Parking Lot Management (Occupancy) Sensor, filed September 20, 2019 (Bosch Waiver Request).

² Bosch Waiver Request at 2.

³ *Id.*

⁴ *Id.* at 1-2.

⁵ 47 CFR § 15.245.

⁶ Bosch Waiver Request at 1. Bosch notes that it considered two other Part 15 rule sections for waiver, but that neither would be appropriate. Specifically, Bosch states: "Other rule sections in Part 15 which accommodate intentional radiators in the band 2400-2483.5 MHz are unavailing for more basic reasons. Section 15.247 of the

(continued....)

OET seeks comment on the Bosch waiver request.

Bosch submitted its waiver request electronically through the Commission's Electronic Comment Filing System (ECFS) as a non-docketed filing in FCC INBOX-PART 15 (Petition for Waiver of Part 15).

OET has concluded that, in order to develop a complete record on the issues presented by this request, this proceeding will be treated, for *ex parte* purposes, as "permit-but-disclose" in accordance with Section 1.1200(a) of the Commission's rules, subject to the requirements under Section 1.1206(b).

Pursuant to sections 1.415 and 1.419 of the Commission's rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS). See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <http://fjallfoss.fcc.gov/ecfs2/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th St., SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

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Rules, which permits intentional radiators in the entire band 2400-2483.5 MHz limits operation under the provisions of that Section to frequency hopping and digitally modulated intentional radiators. The rule is not intended to apply to field disturbance sensors such as the Bosch PLS device. Furthermore, the Bosch device cannot comply with the hopping parameters specified in Section 15.247(a)(1)(i-iii), in terms of the minimum number of steps permitted by the rule. Nor can Bosch avail itself of Section 15.249 which applies to high-power point-to-point communications using directional antennas." Bosch Waiver Request at 5.

Parties should also send a copy of their filings to Rodney Small, Office of Engineering and Technology, Federal Communications Commission, Room 7-A121, 445 12th Street, S.W., Washington, D.C. 20554, or by e-mail to Rodney.Small@fcc.gov.

Documents are available for public inspection and copying during business hours at the FCC Reference Information Center, Portals II, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554.

Office of Engineering and Technology contact: Rodney Small at 202-418-2452.

By the Chief, Office of Engineering and Technology

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